POLREP (Final)
Allied Chemical Corp.
Front Royal Works
Kendrick Lane
Front Royal, VA 22630

Lat.: 38°93.61N, Lon: 78°.214W

ATTN: EPA III RRC

I. SITUATION (as of September 25, 2008)

A. The site is the location of a former sulfuric acid manufacturing facility. The site is primarily characterized by a fenced in area with flat, grass covered land with concrete platforms where process tanks and a cooling tower once stood, a "Butler-type" building, an abandoned rail-spur and associated loading / unloading platform, and a perimeter engineered surface water drainage ditch on the eastern side of the fenced in facility. Outside of the perimeter fence and within the property line are two small ponds, (eastern and western impoundments), and a bermed ditch which was used to handle site process water run-off.

B. In early November 2007, the EPA, START and the potentially responsible party (PRP) conducted a removal site evaluation in accordance with the removal plan submitted by the PRP to identify the areas of concern. Planned excavation areas were evaluated and a work scheduled was agreed upon to begin in mid-November 2007.

II. ACTIONS

A. The PRP and its contractor mobilized to the site and began implementing soil excavation on the perimeter drainage ditch system. The outside north end of the perimeter fence was excavated as was the large drain pipe running under the rail spur. These drain pipes contained sulfur which was removed. All contaminated soil was stockpiled on-site for future disposal. The concrete platform which previously housed the cooling towers and cooling water reservoir were demolished in on itself.

B. Test holes were dug into the bermed pit and debris was found inside. Plans to excavate this area were put into place. Process and storm water from the eastern and western impoundments were removed, containerized, filtered and disposed of by mid-December 2007.

C. Excavation of the bermed pit and impoundments began and were completed by early December 2007. Soils from these areas were staged for future disposal. By mid-December 2007, dead trees, shrubs and under-growth were removed and

chipped up, excavated areas were successfully backfilled, graded, and covered with grass seed and hay, wood chips from the dead trees and shrubs were spread out over the excavated areas outside of the perimeter fence line, as natural cover, and all the staged, contaminated soil was disposed of at an approved landfill.

D. At the end of December 2007, EPA, START, the PRP and its contractor conducted a site walk-through to view the completed work. Recent snowfall impeded the ability to evaluate all of the work. The visible areas of concern were completed satisfactorily.

E. A follow up visit was conducted in late May 2008. Site conditions were satisfactory and some small areas were indentified as needing cosmetic improvements. Areas which were previously identified as having bits of sulfur in them, but were not part of the areas of concern were addressed. These areas were located; under the loading / unloading platform adjacent to the rail spur, the drains under the steel plates along the rail spur, and throughout areas where process facilities once stood. These areas were successfully hand-excavated.

F. The total volume disposed off was 200,276 tons (non-hazardous).

III. FUTURE ACTIVITIES

A. PRP will conduct appropriate maintenance as needed.

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